

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

August 25, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

In Re: Terrorist Attacks on September 11, 2001, 03-MDL-1570 (S.D.N.Y.)
(GBD) (SN) – Extension Request

Dear Judge Netburn:

We write on behalf of the Plaintiffs' Executive Committees ("PECs") and the Defendants' Executive Committee ("DEC") to jointly request a one week extension of the August 27, 2021 deadline to submit a joint scheduling proposal. *See* August 13, 2021 Order at 1 (ECF No. 7014). The PECs and DEC continue to meet and confer regarding a joint scheduling proposal and require additional time. Neither party has previously requested an adjournment.

We thank the Court for its attention to this matter.

Respectfully submitted,

KREINDLER & KREINDLER

MOTLEY RICE

/s/ Andrew J Maloney, III, Esquire
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/s/ Robert T. Haefele, Esquire
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The Honorable Sarah Netburn

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Page 2

MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

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/s/ Sean P. Carter, Esquire

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MDL 1570 Plaintiffs' Exec. Committee
for Commercial Claims

ANDERSON KILL P.C.

/s/ Jerry S. Goldman, Esquire

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

cc: The Honorable Judge George B. Daniels (via ECF)
All Counsel of Record (via ECF)